

Soyeon Choi

From: DRP General Plan Project
Sent: Thursday, August 07, 2014 5:04 PM
To: 'William Halligan'
Cc: Leon Freeman; Soyeon Choi
Subject: FW: Comments LA COUNTY DEIR General Plan due 8.7.2014

FYI

From: Joyce Dillard [mailto:dillardjoyce@yahoo.com]
Sent: Thursday, August 07, 2014 4:43 PM
To: DRP General Plan Project
Subject: Comments LA COUNTY DEIR General Plan due 8.7.2014

The County has acreage of

- 38.8% Open Space
- 35.4% Rural
- 16.57% Other

Emphasis should be placed on maintaining natural lands and the beneficial uses and effects of flood control, forestry, deserts, flora, fauna and wildlife to the overall health of the citizens in the County.

You state:

BIOLOGICAL RESOURCES
5.4.3 Relevant General Plan Goals and Policies
Conservation and Natural Resources Element

Policy C/NR 3.9: Consider the following in the design of a project that is located within an SEA, to the greatest extent feasible:

- *Preservation of biologically valuable habitats, species, wildlife corridors and linkages;*
- *Protection of sensitive resources on the site within open space;*
- *Protection of water sources from hydromodification in order to maintain the ecological function of riparian habitats;*
- *Placement of the development in the least biologically sensitive areas on the site (prioritize the preservation or avoidance of the most sensitive biological resources onsite);*
- *Design required open spaces to retain contiguous undisturbed open space that preserves the most sensitive biological resources onsite and/or serves to maintain regional connectivity;*
- ***Maintenance of watershed connectivity by capturing, treating, retaining, and/or infiltrating storm water flows on site; and***
- *Consideration of the continuity of onsite open space with adjacent open space, in project design.*

Comment:

Storm water flows onsite could be interpreted as Low Impact Development, as required by the Los Angeles Regional Water Board's MS4 permit CAS004001 or it could mean flood control as in a dam or reservoir. Watershed connectivity has to do with the function of flow, not necessarily of water

supply. Birds and wildlife should be a consideration. Urban wildlife protection is missing from this discussion.

This should be explored in more detail.

You state:

5. Environmental Analysis

CULTURAL RESOURCES

Parks and Recreation Element

- ***Policy P/R 5.1: Preserve historic resources on County park properties, including buildings, collections, landscapes, bridges, and other physical features.***
- ***Policy P/R 5.2: Expand the collection of historical resources under the jurisdiction of the County, where appropriate.***
- ***Policy P/R 5.3: Protect and conserve natural resources on County park properties, including natural areas, sanctuaries, and open space preserves.***
- ***Policy P/R 5.4: Insure maintenance, repair, rehabilitation, restoration, or reconstruction of historical resources in County parks and recreational facilities are carried out in a manner consistent with the most current Secretary of the Interior's Standards for the Treatment of Historic Properties with Guidelines for Preserving, Rehabilitating, Restoring, and Reconstructing Historic Buildings.***
- ***Policy P/R 5.5: Preserve and develop facilities that serve as educational resources that improve community understanding of and appreciation for natural areas, including watersheds***
- ***Policy P/R 5.7: Integrate a range of cultural arts programs into existing activities, and partner with multicultural vendors and organizations***

Comment:

Watersheds, as ecological preserves, should not have facilities onsite, as it disrupts nesting and other aspects of birds and wildlife.

Facilities should be developed to encourage exploration. Trails need to be considered as there are mitigation effects.

You state:

5. Environmental Analysis

HYDROLOGY AND WATER QUALITY

Conservation and Natural Resources Element

- ***Policy C/NR 5.1: Support the LID philosophy, which seeks to plan and design public and private development with hydrologic sensitivity, including limits to straightening and channelizing natural flow paths, removal of vegetative cover, compaction of soils, and distribution of naturalistic BMPs at regional, neighborhood, and parcel-level scales.***
- ***Policy C/NR 5.2: Require compliance by all County departments with adopted Municipal Separate Storm Sewer System (MS4), General Construction, and point source NPDES permits.***
- ***Policy C/NR 5.3: Actively engage with stakeholders in the formulation and implementation of surface water preservation and restoration plans, including***

plans to improve impaired surface water bodies by retrofitting tributary watersheds with LID types of BMPs.

- **Policy C/NR 5.4:** Actively engage in implementing all approved Enhanced Watershed Management Programs/Watershed Management Programs and Coordinated Integrated Monitoring Programs/Integrated Monitoring Programs or other County-involved TMDL implementation and monitoring plans.
- **Policy C/NR 5.5:** Manage the placement and use of septic systems in order to protect nearby surface water bodies.
- **Policy C/NR 5.6:** Minimize point- and nonpoint- source water pollution.
- **Policy C/NR 5.7:** Actively support the design of new and retrofit of existing infrastructure to accommodate watershed protection goals, such as roadway, railway, bridge, and other—particularly— tributary street and greenway interface points with channelized waterways.
- **Policy C/NR 6.1:** Support the LID philosophy, which incorporates distributed, post-construction, parcel-level stormwater infiltration as part of new development.
- **Policy C/NR 6.2:** Protect natural groundwater recharge areas and regional spreading grounds.
- **Policy C/NR 6.3:** Actively engage in stakeholder efforts to disperse rainwater and stormwater infiltration BMPs at regional, neighborhood, infrastructure, and parcel-level scales.
- **Policy C/NR 6.4:** Manage the placement and use of septic systems in order to protect high groundwater.
- **Policy C/NR 6.5:** Prevent stormwater infiltration where inappropriate and unsafe, such as in areas with high seasonal groundwater, on hazardous slopes, within 100 feet of drinking water wells, and in **contaminated soils**.
- **Policy C/NR 7.1:** Support the LID philosophy, which mimics the natural hydrologic cycle using undeveloped conditions as a base, in public and private land use planning and development design.
- **Policy C/NR 7.2:** Support the preservation, restoration and strategic acquisition of available land for open space to preserve watershed uplands, natural streams, drainage paths, wetlands, and rivers, which are necessary for the healthy function of watersheds.
- **Policy C/NR 7.3:** Actively engage with stakeholders to incorporate the LID philosophy in the preparation and implementation of watershed and river master plans, ecosystem restoration projects, and other related natural resource conservation aims, and support the implementation of existing efforts, including Watershed Management Programs and Enhanced Watershed Management Programs.
- **Policy C/NR 7.4:** Promote the development of multiuse regional facilities for stormwater quality improvement, groundwater recharge, detention/attenuation, flood management, retaining nonstormwater runoff, and other compatible uses.

Comment:

Permitting is based on Source Point pollution at outfall measurement points. Urban runoff is not a Clean Water Act definition. *Ambient Water Quality Criteria for the Protection of Human Health* is the EPA standard, not a haphazard approach. *LID philosophy* is not measured or monitored

There are many Watershed Management Programs, including the new ones formed by the MS4 permitting. Enhanced Watershed Management Programs are part of that permitting.

There is no Safe Harbor allowed, yet you take the policy to incorporate them without a policy to reduce pollutant loads to satisfy the requirements of the law.

Contaminated soils should be addressed further. There can be contamination from chemicals or natural contamination from oil deposits, methane and related gas emissions.

With the Los Angeles River Ecosystem Feasibility Study proceeding with the US Army Corps of Engineers, flood control, drainage area mitigation needs to be revised.

Note:

There are errors in Table *1-2 Proposed Project Buildout Projections (by Planning Area)*. Hacienda Heights Community Plan and Walnut Park Neighborhood Plan do not total correctly.

Joyce Dillard
P.O. Box 31377
Los Angeles, CA 90031